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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PAUL TURPIN,
Petitioner

v.

IMMIGRATION and NATURALIZATION
SERVICE,
Respondent

Civil No. 1:01-CV-0168

(Judge Rambo)

FILED
HARRISBURG
MAR 16 2001
MARY E. DIANDREA, CLERK
Per. DEPUTY CLERK

MOTION TO CONTINUE BRIEFING DEADLINE

AND NOW comes the petitioner, Paul Turpin, through his attorney Daniel I. Siegel of the Federal Public Defender's Office, and files this Motion to Continue Briefing Deadline.

1. On December 1, 2000, petitioner filed in the Southern District of New York a *pro se* petition for writ of habeas corpus pursuant to 28 U.S.C. §2241.
2. On January 18, 2001, the Southern District of New York issued an order transferring this case to the Middle District of Pennsylvania.
3. On February 7, 2001, this Honorable Court ordered that respondent file a brief within twenty days to show cause as to why petitioner should not be granted habeas corpus relief. In that same order, this Honorable Court ordered that petitioner's reply brief be due within fifteen days of the filing of respondent's brief.

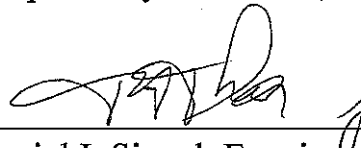

4. On February 27, 2001, respondent filed a brief to show cause as to why petitioner should not be granted habeas corpus relief.
5. On March 13, 2001, The Federal Public Defender's Office was appointed to represent petitioner in this matter.
6. Pursuant to this Honorable Court's order of February 7, 2001, petitioner's reply brief was due March 14, 2001.
7. Because the Federal Public Defender's Office was appointed just one day prior to the reply brief deadline, it is respectfully requested that this Honorable Court grant a continuance of twenty-one days for the filing of petitioner's reply brief.

WHEREFORE, it is respectfully requested that petitioner's Motion to Continue Briefing Deadline be granted.

Respectfully submitted,

Date: _____

3/16/01

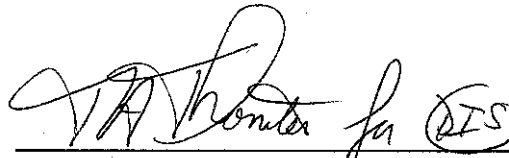
Daniel I. Siegel, Esquire
Asst. Federal Public Defender
100 Chestnut Street, Suite 306
Harrisburg, PA 17101
Attorney for Paul Turpin
Attorney ID # 38910

CERTIFICATE OF CONCURRENCE

I, Daniel I. Siegel, Assistant Federal Public Defender, certify that on March 16, 2001, The Federal Public Defender's Office contacted Assistant United States Attorney Mary Catherine Frye and she stated that the government would concur in the foregoing motion.

Date: _____

3/16/01

A handwritten signature in dark ink, appearing to read "D.I. Siegel for (D.I.S.)", written over a horizontal line.

DANIEL I. SIEGEL, ESQUIRE
Asst. Federal Public Defender

CERTIFICATE OF SERVICE


I, Daniel I. Siegel, of the Federal Public Defender's Office do hereby certify that on this date I served a copy of the foregoing **MOTION TO CONTINUE BRIEFING DEADLINE** by hand delivering the same to the following:

Dulce Donovan, Esquire
United States Attorney's Office
Federal Building, Room 217
228 Walnut Street
Harrisburg, PA 17108

and by placing the same in the United States mail, first class in Harrisburg, Pennsylvania, addressed to the following:

Paul Turpin
Pike County Jail
HC 8, Box 8601
Hawley, PA 18428

Date: 3/16/01


DANIEL I. SIEGEL, ESQUIRE
Asst. Federal Public Defender
Attorney for Paul Turpin